

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X

MCCONNELL DORCE, et al.,

NOTICE OF MOTION

Plaintiffs, 19-CV-02216 (DAB)

-against-

CITY OF NEW YORK, et al.,

Defendants..

----- X

PLEASE TAKE NOTICE that upon the accompanying Declaration of Andrea B. Feller, dated May 15, 2019, and the Exhibits annexed thereto, and the accompanying Memorandum of Law, dated May 15, 2019 defendants the City of New York and Maria Torres-Springer (“Municipal Defendants”) will move this Court, before the Hon. Deborah A. Batts, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, NY 10007, at a date and time to be determined by the Court, for an order, pursuant to Fed. R. Civ. P. 12(b)(6), dismissing Plaintiffs’ Complaint in its entirety with prejudice, and for such other and further relief as this Court may deem just and proper.

Dated: New York, New York
May 15, 2019

ZACHARY W. CARTER
Corporation Counsel of the City of New York
Attorney for Municipal Defendants
100 Church Street, Room 3-250
New York, New York 10007
Tel: (212) 356-2565
E-mail: afeller@law.nyc.gov

_____/S/
ANDREA B. FELLER

TO: **VALLI KANE & VAGNINI LLP**

Attorney for Plaintiffs

600 Old Country Road, Suite 519118-21 Queens Blvd, Suite 603

Garden City, New York 11530

Tel: 516-203-7180

GOLDSTEIN HALL PLLC

Attorney for Neighborhood Restore HDFC, Inc. and BSDC Kings Covenant HDFC, Inc.

80 Broad Street, Suite 803

New York, NY 10004

Tel: 646-768-4127